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ADMITTED TO THE NEW YORK BAR

November 9, 2023

Via ECF

Magistrate Judge Cheryl L. Pollak
Chambers Room 1230
Courtroom 13B - South

In re: Letter Motion to be Relieved as Counsel
1:21-cv-01125-HG-CLP *Ortega v. Yagudaev et al*

Dear Hon. Court:

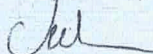
This office represents corporate Defendant Champagne Room Bk, Inc. The purpose of this letter motion is to respectfully request leave to withdraw as counsel pursuant to Rule 1.4.

Without besmirching my client who is currently in Bankruptcy the principle of the corporation has made it as such that I cannot continue to represent him. The attorney client relationship has so deteriorated that I cannot in good conscience represent the corporation due to the conduct of its principle towards me and my staff.

The level of continual disrespect, clear misunderstanding of the processes being explained to it, and frankly, the paying of bills in this and other cases make for an impossible representation and necessitates this request for leave to withdraw. I am happy to discuss this further *in camera*.

Therefore, I am respectfully requesting that this matter be placed on the calendar to consider my motion to withdraw my representation for the reasons set forth in this letter motion, and for reasons I will put on the record.

Respectfully,



Victor M. Feraru

cc: Defendant Champagne Room Bk Inc. via Email